

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

GERARD CAMPBELL, individually on behalf of  
himself and all others similarly situated,

Plaintiffs,

v.

DRINK Daily Greens, LLC, a Delaware limited  
liability company,

Defendant.

Case No. 1:16-cv-07176-ILG-PK

**DEFENDANT DRINK DAILY GREENS,  
LLC'S NOTICE OF MOTION TO  
SANCTION PLAINTIFF AND HIS  
LAWYERS PURSUANT TO FRCP RULE  
11**

J. Noah Hagey, Esq.  
Matthew Borden, Esq. (*pro hac vice*)  
Amit Rana, Esq. (*pro hac vice*)  
BRAUNHAGEY & BORDEN LLP  
7 Times Square, 27th Floor  
New York, NY 10036  
Tel./Fax: (646) 829-9403  
hagey@braunhagey.com  
borden@braunhagey.com  
rana@braunhagey.com

*Attorneys for Defendant  
Drink Daily Greens, LLC*

**TO PLAINTIFF AND HIS ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE THAT** as soon as the matter may be heard in the United States District Court, Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, NY 11201, before the Honorable I. Leo Glasser, Defendant Drink Daily Greens, LLC will, and hereby does move the Court to sanction Plaintiff Gerard Campbell and his lawyers. This Motion is based on this Notice of Motion, the accompanying Memorandum of Law, the Declaration of J. Noah Hagey and all exhibits attached thereto, the Declaration of Shauna Martin, and on such other written and oral argument as may be presented to the Court.

Dated: November 2, 2018

Respectfully Submitted,  
BRAUNHAGEY & BORDEN, LLP

/s/ J. Noah Hagey  
By: J. Noah Hagey

7 Times Square, 27th Floor  
New York, NY 10036  
Tel./Fax: (646) 829-9403  
hagey@braunhagey.com

*Attorneys for Defendant Drink Daily  
Greens, LLC*